

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION

ZUNUM AERO, INC.,

Plaintiff,

v.

THE BOEING COMPANY; BOEING
HORIZONX VENTURES, LLC; SAFRAN,
S.A.; SAFRAN CORPORATE VENTURES,
S.A.S.; SAFRAN ELECTRICAL &
POWER, S.A.S.; SAFRAN HELICOPTER
ENGINES, SASU,

Defendants.

) Civil Action No. 2:21-cv-00896

)

) **FINAL STIPULATED MOTION FOR AN**

) **ORDER EXTENDING TIME FOR**

) **SPECIALLY APPEARING**

) **DEFENDANTS SAFRAN, S.A.; SAFRAN**

) **CORPORATE VENTURES, S.A.S.;**

) **SAFRAN ELECTRICAL & POWER,**

) **S.A.S.; AND SAFRAN HELICOPTER**

) **ENGINES, S.A.S.U. TO MOVE, PLEAD,**

) **OR OTHERWISE RESPOND TO**

) **PLAINTIFF ZUNUM AERO INC.'S**

) **FIRST AMENDED COMPLAINT AND**

) **TO SERVE INITIAL DISCLOSURES**

) **PURSUANT TO FRCP 26(a)(1)**

) **TO OCTOBER 18, 2021**

)

NOTED ON MOTION CALENDAR:

September 16, 2021 (Local Rule 7(d)(1))

Pursuant to Local Civil Rules 7(j) and 10(g), specially appearing defendants Safran S.A., Safran Corporate Ventures, S.A.S. (“SCV”), Safran Electrical & Power, S.A.S. (“SEP”), and Safran Helicopter Engines, S.A.S.U. (“SHE”) (collectively, the “Safran Defendants”) and plaintiff Zunum Aero, Inc. (“Zunum”) hereby submit this stipulated motion to extend the Safran Defendants’ time to move, plead, or otherwise respond to the First Amended Complaint (“FAC”) and to serve initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) to October 18, 2021.

WHEREAS, pursuant to this Court’s Order, dated August 10, 2021, granting the parties’ second stipulated motion to extend time to move, plead, or otherwise respond, the Safran Defendants’ current deadline to respond to the FAC is September 17, 2021. *See* Doc. 35.

WHEREAS, pursuant to this Court’s Order, dated September 1, 2021, granting the parties’ first stipulated motion to extend time to serve initial disclosures, the Safran Defendants’ current deadline to serve initial disclosures is October 1, 2021. *See* Doc. 39.

WHEREAS, good cause exists to extend the Safran Defendants’ deadlines to move, plead, or otherwise respond to the FAC and to serve initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) because Zunum and the Safran Defendants continue to discuss a potential resolution of the Safran Defendants’ jurisdictional defenses, and an additional extension would provide the parties with additional time needed to discuss a resolution and potentially avoid the need to expend party and judicial resources on motion practice (including jurisdictional motion(s) and motion(s) to compel arbitration) in response

1 to the FAC.

2 WHEREAS, the parties anticipate this will be the last stipulation to extend the Safran
3 Defendants' deadlines as the parties are close to an agreement under which Zunum would
4 dismiss the Safran Defendants from this case.

5 WHEREAS, by entering into this stipulation, no Safran Defendant makes a general
6 appearance, submits to the jurisdiction of this Court, or waives any right or defense.

7 WHEREAS, this stipulated motion is filed in good faith and not for purposes of
8 delay.

9 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by and
10 among Zunum and the Safran Defendants, subject to the Court's approval, that the deadlines
11 for the Safran Defendants to move, plead, or otherwise respond to plaintiff's FAC and to serve
12 initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) are extended to
13 October 18, 2021.

14 Dated: September 16, 2021

s/ Catherine S. Simonsen

Catherine S. Simonsen (WSBA # 45552)

Bryan A. Merryman (*pro hac vice* application
forthcoming)

J. Taylor Akerblom (*pro hac vice* application
forthcoming)

WHITE & CASE LLP

555 S. Flower Street, Suite 2700

Los Angeles, CA 90071-2433

Telephone: (213) 620-7700

Facsimile: (213) 452-2329

Email: catherine.simonsen@whitecase.com

bmerryman@whitecase.com

takerblom@whitecase.com

Attorneys for Specially Appearing Defendants

22 STIPULATED MOTION TO EXTEND TIME – 3

White & Case LLP

555 S. Flower Street, Suite 2700

Los Angeles, CA 90071-2433

Tel: (213) 620-7700

Fax: (213) 452-2329

SAFRAN, S.A., SAFRAN CORPORATE
VENTURES, S.A.S., SAFRAN ELECTRICAL
& POWER, S.A.S., and SAFRAN
HELICOPTER ENGINES, S.A.S.U.

Dated: September 16, 2021

s/ Eliot M. Harris
Eliot M. Harris (WSBA #36590)
WILLIAMS, KASTNER & GIBBS PLLC
601 Union Street, Suite 4100
Seattle, WA 98101-2380
Telephone: (206) 628-6600
Facsimile: (206) 628-6611
Email: eharris@williamskastner.com

Colin R. Hagan (*pro hac vice*)
David J. Shlansky (*pro hac vice*)
SHLANSKY LAW GROUP, LLP
1 Winnisimmet Street
Chelsea, MA 02150
Telephone: (617) 492-7200
Email: colin.hagan@slglawfirm.com
david.shlansky@slglawfirm.com

Attorneys for Plaintiff
ZUNUM AERO INC.

PROPOSED ORDER

IT IS SO ORDERED.

Dated this 17th day of September, 2021


UNITED STATES DISTRICT JUDGE

STIPULATED MOTION TO EXTEND TIME – 4

White & Case LLP
555 S. Flower Street, Suite 2700
Los Angeles, CA 90071-2433
Tel: (213) 620-7700
Fax: (213) 452-2329